

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON**

In re:
James Jackson and Lucas Jackson,
Debtors.

Chapter 7

**RESPONSE OF SARAH AND REGINA
ALONSO TO DEBTOR'S OBJECTION
TO CLAIMS**

Sarah (“Sarah”) and Regina Alonso (“Regina”) hereby respond to the Objection (the “Objection”) of James Jackson and Lucas Jackson (the “Debtors”) to claim numbers 4 and 5 filed by the Respondents. In support of their response, the Respondents respectfully state as follows:

PROCEDURAL HISTORY, RELEVANT FACTS AND RESPONSE

1. On March 2, 2023, Sarah commenced a lawsuit against the Debtors and other defendants in the Western District of Michigan. *See Sarah v. Google LLC, et al.*, Case No. 23-cv-00223 (W.D. Mich.) (“Sarah’s Action”). A true and correct copy of the complaint in Sarah’s Action is attached hereto as **Exhibit A**. Through the Complaint, Sarah asserted claims against Debtors stemming from the Debtors’ grooming of Sarah while she was a minor with the intent of sexually assaulting her and Debtor James Jackson’s rape of Sarah. The Complaint further asserts claims against the Debtors’ based on their defamation of Sarah after she was raped by Debtor James Jackson.

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1 2. The Objection asserts that Sarah did not state an amount of damages. Sarah will
2 amend her claim to assert damages in an amount of no less than \$5,000,000 against the Debtors.

3 3. Sarah's claim may not be adjudicated by this Court as a personal injury claim
4 pursuant to, inter alia, 28 U.S.C. §157(b)(2)(B). Sarah reserves all rights regarding adjudication
5 or liquidation of her claim, including a right to a Jury Trial.

6 4. On February 8, 2023, Regina commenced a lawsuit against the Debtors and other
7 defendants in the Middle District of Florida. *See Regina Alonso v. Google LLC, et al.*, Case No.
8 23-cv-00091 (M.D.Fl.) ("Regina's Action"). A true and correct copy of the complaint in Regina's
9 Action is attached hereto as **Exhibit B**. Through the Complaint, Regina asserted claims against
10 Debtors stemming from the Debtors' grooming of Regina with the intent of sexually assaulting
11 her while she was a minor. In addition, Debtor Lucas Jackson is or was in possession of
12 pornographic images of Regina taken while she was a minor. The Complaint asserts claims
13 against the Debtors on account of their attempts to traffic Regina for purposes of engaging in sex
14 acts while Regina was a minor and against Debtor Lucas Jackson for possession of pornographic
15 images of Regina while she was a minor.
16

17 5. The Objection asserts that Regina did not state an amount of damages. Regina will
18 amend her claim to assert damages in an amount of no less than \$5,000,000 against the Debtors.

19 6. The Objection asserts that Regina's claim should be denied because it did not attach
20 any documentation. A claim for personal injury is not required to attach documentation.
21 Moreover, the Debtors were and are fully aware of the basis for Regina's claim. Regina's Action
22 is identified and listed on the Debtors' Statement of Financial Affairs. *See* Docket No. 10, Part 4,
23 question 9. Nevertheless, Regina hereby amends her claim by incorporating Exhibit B therein by
24 reference.
25

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7. Regina's claim may not be adjudicated by this Court as a personal injury claim pursuant to, inter alia, 28 U.S.C. §157(b)(2)(B). Regina reserves all rights regarding adjudication or liquidation of her claim, including a right to a Jury Trial.

WHEREFORE, the Respondents hereby request that the Court overrule the Objection and grant such other and further relief as the Court may deem just, proper and equitable.

Dated: May 1, 2024
New York, NY

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CERTIFICATE OF MAILING

I declare under penalty of perjury under the laws of the United States as follows: I mailed via regular mail a true and correct copy of the Response of Sarah and Regina Alonso To Debtor's Objection to Claims to the following:

James & Lucas Jackson
8702 – 123rd St. E.
Puyallup, WA 98383

The following parties received notice via ECF:

Executed at Seattle, Washington on the 1st day of May, 2024.

/s/Dominika Falkowski
Dominika Falkowski
Legal Assistant

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